

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 9 1985

N/S 533

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mark Moothart, General Manager
Pacific Wood Treating Corporation
111 W. Division Street
Ridgefield, Washington 98642

Re: Ridgefield Brick and Tile Site
Environmental Protection Agency ID. No.

Dear Mr. Moothart:

Hazardous waste was disposed at the reference remains at this facility. Because this facility after January 26, 1983, the 40 CFR 264 permit to this facility. Washington Department of Ecology regulations were applicable to this facility at site came to the attention of WDOE and EPA. As you to upgrade the compliance of this facility with the recent passage of the Hazardous and Solid Waste Act of 1980, facilities which disposed of wastes after subject to the 40 CFR 264 and 270 regulations. disposed of at this facility after July 26, 1982 in place, a Part B application will be required. a formal request for Part B of your application. under the authority of 40 CFR Part 270.10(e)(4).

The complete Part B application must be submitted to this office within 6 months of receipt of this letter. Assuming you choose to close instead of continuing to operate as a landfill, a complete application would, at a minimum, include closure requirements, post-closure requirements, and financial assurances, as specified under 40 CFR Parts 264 and 270. Failure to comply with this time limit could result in penalties under Section 3008 of RCRA of up to \$25,000 a day. While the regulations allow 6 months to complete the Part B application process, we urge you to submit your application earlier if possible. If you submit any information under a claim of confidentiality, please indicate this fact. Such claims must be substantiated as outlined in 40 CFR Part 2.

WMB:RStamnes:jw 3/4/85 3563G rev 3/15/5tb

UNIT OFFICE

CONCURRENCES

| | | | | | |
|---------|---|---------|--|--|--|
| SYMBOL | WMB:RStamnes:jw 3/4/85 3563G rev 3/15/5tb | | | | |
| SURNAME | Hofer | Feigner | | | |
| DATE | 4/9/85 | | | | |

P 492 763 031

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

| | |
|---|----------------------|
| Sent to | Mark Moothart |
| Street and No. | 111 W. Division St. |
| P.O., State and Zip | Ridgefield, WA 98642 |
| Postage | |
| Certified Fee | |
| Special Delivery Fee | |
| Restricted Delivery Fee | |
| Return Receipt Showing to whom and Date Delivered | |
| Return Receipt Showing to whom, Date, and Address of Delivery | |
| TOTAL Postage and Fees | \$ |
| Postmark or Date | |

PS Form 3800, Feb. 1982



3058057

P492 763031

W/S 533

STICK POSTAGE STAMPS TO ARTICLE TO COVER FIRST CLASS CERTIFIED MAIL FEE, AND CHARGES FOR ANY SELECTED OPTION. If you want this receipt postmarked, stick the gummed stub on the article leaving the receipt attached and present the article at your rural carrier. (no extra charge)

If you do not want this receipt postmarked, stick the gummed stub on the back of the article, detach and retain the receipt. If you want a return receipt, write the certified-mail number on the back of the article, and attach it to the front of the article. If you want a receipt card, Form 3811, and attach it to the front of the article. Endorse front of article as follows:

Permits. Otherwise, affix to back of article. Endorse front of article as follows:

POSTED adjacent to the number

If you want delivery restricted to the addressee, or to an addressee named in the article, write RESTRICTED DELIVERY on the front of the article. If you want restricted delivery to the addressee named in the article, write RESTRICTED DELIVERY on the front of the article. If fees for the services requested in the appropriate space are not indicated, check the applicable blocks in Item 10. If a receipt is requested, check the applicable blocks in Item 11. If a receipt is requested, check the applicable blocks in Item 11. If a receipt is requested, check the applicable blocks in Item 11. If a receipt is requested, check the applicable blocks in Item 11.

1a 6906
4.9.85
3a

USEPA RCRA
3058057

Hazardous waste was disposed at the referenced facility and waste remains at this facility. Because this facility did not receive waste after January 26, 1983, the 40 CFR 264 permitting regulations under the Environmental Protection Agency's (EPA) administration were not applicable to this facility. Washington Department of Ecology (WDOE) interim status regulations were applicable to this facility at the time this disposal site came to the attention of WDOE and EPA. Accordingly WDOE worked with you to upgrade the compliance of this facility with their regulations. With the recent passage of the Hazardous and Solid Waste Amendments of 1984, facilities which disposed of wastes after July 26, 1982, are now subject to the 40 CFR 264 and 270 regulations. Because listed waste was disposed of at this facility after July 26, 1982, and that waste is still in place, a Part B application will be required. This letter constitutes a formal request for Part B of your application. This request is made under the authority of 40 CFR Part 270.10(e)(4).

The complete Part B application must be submitted to this office within 6 months of receipt of this letter. Assuming you choose to close instead of continuing to operate as a landfill, a complete application would, at a minimum, include closure requirements, post-closure requirements, and financial assurances, as specified under 40 CFR Parts 264 and 270. Failure to comply with this time limit could result in penalties under Section 3008 of RCRA of up to \$25,000 a day. While the regulations allow 6 months to complete the Part B application process, we urge you to submit your application earlier if possible. If you submit any information under a claim of confidentiality, please indicate this fact. Such claims must be substantiated as outlined in 40 CFR Part 2.

WMB:RStamnes:jw 3/4/85 3563G rev 3/15/5tb

| UNITS OFFICE. | | CONCURRENCES | |
|---------------|------------------------------|--------------|--|
| SYMBOL | WDB:RStammes:jw 3/4/85 35630 | rev 3/18/51 | |
| SURNAME | Hofer Feigner | | |
| DATE | | | |

PS Form 3841, Dec. 1980

- **SENDER:** Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☒ Show to whom and date delivered 0
- ☐ Show to whom, date, and address of delivery.. 0
2. ☐ **RESTRICTED DELIVERY** 0
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$ _____

3. ARTICLE ADDRESSED TO:

*Mark Shook at Len York
fac. Wood Theater Co.
14 W. Division St.
Bellevue, WA 98004*

4. TYPE OF SERVICE:

- ☐ REGISTERED ☐ INSURED
☐ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER

*P492
763031*

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

5. **DATE OF DELIVERY**

4-11-85

POSTMARK

6. **ADDRESSEE'S ADDRESS** (Only if requested)

7. **UNABLE TO DELIVER BECAUSE:**

7a. **EMPLOYEE'S INITIALS**

22

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

PENALTY FOR PRIVATE
USE TO AVOID PAYMENT
OF POSTAGE, \$300



**RETURN
TO**



Robert Stamnes, EPA H/S 533

(Name of Sender)

1200 Sixth Ave.

(Street or P.O. Box)

Seattle, WA 98101

(City, State, and ZIP Code)

The Part B application requirements specified in 40 CFR Parts 270.14 through 270.21 reference other regulations such as Part 264. For your convenience, we have enclosed commercial reprints of 40 CFR Parts 264 and 270. This is the current available form of consolidated information. If copies of other regulations are needed, please make a specific request to this office.

Because there is no Part B application form, we are very willing to provide assistance, either verbal or written, in order to ensure the submittal of a complete and accurate application. You will be contacted shortly for the purpose of setting up a meeting regarding the Part B application. At that time, we can discuss the permit program in detail and answer specific questions that pertain to your facility.

There are certain areas that deserve special attention immediately as you develop your Part B application. These include the effect of the Hazardous and Solid Waste Act Amendments signed by the President on November 8, 1984, the information needs for past and continuing releases, and the ground water monitoring requirements. Each of these is discussed below.

1. The enclosed document "New RCRA Requirements for Permitting Hazardous Waste Facilities, February 1985," can be used to determine how the new amendments will affect your facility and this application. The permit writer will be prepared to discuss these further at the aforementioned meeting.

2. Past and continuing releases--the enclosed checklist entitled "Information Regarding Potential Releases from Solid Waste Management Units" will assist you in providing the information needed to respond to this subject in your application. All facility records should be reviewed in obtaining the requested information, including the personal recollections of long time employees and past owners and operators. This information is requested under the authority of Section 3007 of RCRA. A handler of hazardous waste who fails to provide information requested under Section 3007 violates the law and may be subject to enforcement action, including administrative penalties, under Section 3008 of RCRA. The information should be sent to Robert Stamnes, RCRA Permits Section, N/S 533, 1200 Sixth Avenue, Seattle, Washington 98101 within one month of receipt of this letter.

Past and continuing releases from any solid or hazardous waste management unit(s) must be addressed in your Part B application. The Part B must include any information necessary to develop a corrective action plan(s), if required. Financial assurance must be provided for any necessary corrective actions.

3. Ground Water Monitoring--One of the more crucial components that requires substantial lead time to complete is the ground water protection information (40 CFR Parts 264 and 270). While some of these requirements should have been acquired under interim status (40 CFR Part 265), it is unlikely that your existing information will fully satisfy the 40 CFR Part 264 requirements. Therefore you must start implementing those monitoring requirements now, so that the resulting data will be available to develop and submit a complete application, which must include, but not be limited to, the following monitoring components:

- a) All interim status monitoring results.
- b) The location and complete characteristics of the uppermost aquifer and any hydraulically interconnected aquifers.
- c) The locations of waste management areas, compliance points and well locations.
- d) Any existing plume(s), including determinations of 40 CFR Part 261 Appendix VIII constituents.
- e) The ground water monitoring well network and well construction.
- f) The sampling and analysis procedures.
- g) The statistical procedures for data analysis.
- h) The background values of monitoring parameters.

The EPA is responsible for implementing the Hazardous and Solid Waste Amendments and the disposal permit program in Washington, while the State has interim authorization to carry out the permitting program for storage and treatment. Accordingly, you will receive a letter from the Washington Department of Ecology (WDOE) requesting your Part B. To facilitate your task, EPA and WDOE will coordinate this effort and allow you to submit an aggregate application.

We are looking forward to working with you during the application process. Should you have any questions, please contact Robert Stamnes at (206) 442-2851.

Sincerely,

Charles E. Findley, Director
Hazardous Waste Division

Enclosures

cc: WDOE, SW
J. Whitworth, WDOE, Olympia

bcc: CARdakan, EPA

F. 7e

APR 8

M/S 533

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mark Moothart, General Manager
Pacific Wood Treating Corporation
111 W. Division Street
Ridgefield, Washington 98642

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Environmental Protection Agency ID. No. WAE COS036904

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WMB:RStammes:jw 3/4/85 3563G rev 3/15/85

| UNIT OFFICE | | CONCURRENCES | |
|-------------|------------------------------|--------------|--|
| SYMBOL | WMB:RStammes:jw 3/4/85 3563G | rev 3/15/85 | |
| SURNAME | Hofer | Feigner | |
| DATE | 4/9/85 | | |

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- e) The ground water monitoring well network and well construction.
- f) The sampling and analysis procedures.
- g) The statistical procedures for data analysis.
- h) The background values of monitoring parameters.

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Charles E. Findley, Director
Hazardous Waste Division

Enclosures

cc: WDOE, SA
J. Mitworth, WDOE, Olympia

bcc: CARDakan, EPA